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TRAVIS MOREDA DAIRY and TRAVIS
MOREDA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER
MOORE IN SUPPORT OF
STIPULATED REQUEST FOR ORDER
CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE (L.R.
6-1, 6-2)**

*[Filed concurrently with Stipulated
Request]*

*Assigned for all purposes to the
Honorable Susan Illston*

DECLARATION OF ALEXANDER MOORE

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice law in the State of California. I represent Travis Moreda and Travis Moreda Dairy (collectively, “TMD”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, and if called as a witness I could and would competently testify thereto.

2. On November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to the Complaint from November 25, 2024, to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days. (ECF No. 11.)

3. On January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024, to December 30, 2024. (ECF No. 15.)

4. On January 27, 2025, the Court granted the parties’ Stipulated Request to Extend Deadlines Set by Court, extending the deadline for the Parties’ joint case management statement until April 11, 2025, and setting the Initial Case Management Conference for April 18, 2025. (ECF No. 19.)

5. On April 8, 2025, the Court granted the parties’ Stipulated Request for Order Extending Initial Case Management Conference Dates to permit the parties to attend an Early Settlement Conference before U.S. Magistrate Judge Peter H. Kang, extending the deadline for the parties’ joint case management statement until July 11, 2025, and setting the Initial Case Management Conference for July 18, 2025. (ECF No. 23.)

6. On June 17, 2025, the Court resolved a discovery dispute by extending TMD’s deadlines to respond to CAT’s first set of written discovery requests from

1 July 1, 2025 to August 1, 2025 and ordering that no depositions shall occur before
2 August 1, 2025. (ECF No. 29.)

3 7. On July 1, 2025, the Court granted the parties' Stipulated Request for
4 Order Staying Case to permit further settlement discussions, extending the deadline
5 for the parties' joint case management statement until October 10, 2025, setting the
6 Initial Case Management Conference for October 17, 2025, and extending TMD's
7 deadlines to respond to CAT's first set of written discovery requests from August 1,
8 2025 to at least September 22, 2025, and ordering that no deposition notices shall be
9 served prior to September 22, 2025. (ECF No. 33.)

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11 8. On September 26, 2025, TMD filed a Motion to Dismiss or, in the
12 Alternative, Motion for Summary Judgment (the "Motion"), which is set for hearing
13 on October 31, 2025. (ECF No. 38.)

14 9. To promote judicial efficiency and conserve the expenditure of
15 attorneys' fees and costs in litigation, the parties jointly request a continuance of the
16 Initial Case Management Conference from October 17 to October 31, 2025, and a
17 corresponding continuance of the deadline for the joint case management statement
18 from October 10 to October 24, 2025, so that the Initial Case Management
19 Conference and Motion hearing occur on the same date.

20
21 I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct.

23 Executed this 3rd day of October 2025, in Oakland, California.

24
25 

26 Alexander Moore